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Attorneys for Defendant  
*Wright National Flood Insurance Services, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

IMAGEKEEPER LLC, a Nevada Limited  
Liability Company,

Plaintiff,

v.

WRIGHT NATIONAL FLOOD INSURANCE  
SERVICES, LLC, a Delaware Limited Liability  
Company,

Defendant.

Civil Action No.: 2:20-cv-01470-GMN-VCF

**STIPULATION AND PROPOSED  
ORDER FOR EXTENSION OF  
DEADLINES RELATED TO THE  
COURT'S TEMPORARY  
RESTRAINING ORDER [ECF NO. 15]  
AND DEFENDANT'S DEADLINE TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT [ECF NO. 1]**

**[FIRST REQUEST]**

Plaintiff IMAGEKEEPER LLC ("ImageKeeper") and Defendant WRIGHT NATIONAL FLOOD INSURANCE ("Wright Flood"), by and through their attorneys of record, and pursuant to Local Rules IA 6-1(a)(b)(c) and 6-2, and this Court's standing order, hereby stipulate and agree as follows:

WHEREAS, on August 6, 2020, ImageKeeper filed its complaint (ECF No. 1), emergency motion for ex parte temporary restraining order and preliminary injunction (ECF No. 2), and supporting documents (ECF Nos. 3-6);

WHEREAS, on August 10, 2020, Wright Flood received, by FedEx, copies of the summons and complaint;

WHEREAS, on August 12, 2020, this Court granted ImageKeeper's emergency motion for ex parte temporary restraining order (*see* ECF No. 15);

WHEREAS, in its order granting ImageKeeper's emergency motion for ex parte temporary

restraining order, the Court set the following briefing schedule:

- Wright Flood shall have until **Wednesday, August 19, 2020**, to file its response brief to ImageKeeper's motion for preliminary injunction (ECF No. 2); and
- ImageKeeper shall have until **Monday August 24, 2020**, to file its reply to Wright Flood's response brief.
- The Court set a hearing on ImageKeeper's motion for preliminary injunction (ECF No. 2) for **Wednesday, August 26, 2020, at 2:00 PM** in Las Vegas Courtroom 7D;
- Wright Flood's answer or other responsive pleading to ImageKeeper's complaint (ECF No. 1) is due on or before **Monday, August 31, 2020**;

WHEREAS, the parties have met and conferred and discussed the aforementioned briefing schedule and deadlines regarding the same, and have agreed and hereby stipulate as follows:

- Wright Flood shall have until **Friday, August 28, 2020**, to file its response brief to ImageKeeper's motion for preliminary injunction (ECF No. 2);
- ImageKeeper shall have until **Friday, September 11, 2020**, to file its reply to Wright Flood's response brief; and
- The Court's hearing on ImageKeeper's motion for preliminary injunction (ECF No. 2), may occur on **Wednesday, September 16, 2020**, or as soon thereafter as available and convenient to the Court;
- Wright Flood's answer or other responsive pleading to ImageKeeper's complaint (ECF No.1) is due on or before **Wednesday, September 23, 2020**.

WHEREAS, the parties have met and conferred and further agree, and hereby stipulate, that the Court's temporary restraining order granted on August 12, 2020 (ECF No. 15) shall remain in full force and effect up to and including the conclusion of the hearing on ImageKeeper's motion for a preliminary injunction or until that time that the Court otherwise sets for expiration of the same;

WHEREAS, the parties agree that good cause exists for the requested extensions based upon the logistical and technical difficulties created by the state and federal government responses to the novel coronavirus; the fact that the parties will agree and hereby stipulate to extend the Court's temporary restraining order (ECF No. 15), which temporarily restrains Wright Flood from certain conduct as outlined and specifically detailed in such order; the volume of ImageKeeper's complaint, emergency motion for ex parte temporary restraining order and preliminary injunction, and other supporting documents; the number of claims at issue; and the facts, allegations and complexity of the matter presented to this Court by this action;

WHEREAS, the parties respectfully request that this Court order the following and submit that this, their first such stipulation and request for an extension of the above-deadlines, is submitted in good faith and not for the purposes of delay:

- Wright Flood shall have until **Friday, August 28, 2020**, to file its response brief to ImageKeeper's motion for preliminary injunction (ECF No. 2);
- ImageKeeper shall have until **Friday, September 11, 2020**, to file its reply to Wright Flood's response brief;
- The Court's hearing on ImageKeeper's motion for preliminary injunction (ECF No. 2), may occur on **Wednesday, September 16, 2020**, or as soon thereafter as available and convenient to the Court;
- The temporary restraining order granted on August 12, 2020 (ECF No. 15) shall remain in full force and effect up to and including the conclusion of the hearing on ImageKeeper's motion for a preliminary injunction or until that time that the Court otherwise sets for expiration of the same; and
- The deadline for Wright Flood's answer or responsive pleading to ImageKeeper's complaint (ECF No. 1) shall be due **Wednesday, September 23, 2020**.

DATED: August 14, 2020

DUANE MORRIS LLP

By: /s/ Daniel B. Heidtke

DOMINICA C. ANDERSON (SBN 2988)

DANIEL B. HEIDTKE (SBN 12975)

*Attorneys for Defendant*

DATED: August 14, 2020

COHEN JOHNSON LLC

By: /s/ H. Stan Johnson

H. STAN JOHNSON (SBN 0265)

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

IMAGEKEEPER LLC, a Nevada Limited Liability Company,

Plaintiff,

v.

WRIGHT NATIONAL FLOOD INSURANCE SERVICES, LLC, a Delaware Limited Liability Company,

Defendant.

Civil Action No.: 2:20-cv-01470-GMN-VCF

**ORDER GRANTING EXTENSION OF DEADLINES RELATED TO THE COURT'S TEMPORARY RESTRAINING ORDER [ECF NO. 15] AND DEFENDANT'S DEADLINE TO RESPOND TO PLAINTIFF'S COMPLAINT [ECF NO. 1]**

**[FIRST REQUEST]**

Plaintiff ImageKeeper LLC ("ImageKeeper") and Defendant Wright National Flood Insurance Services, LLC ("Wright Flood") have stipulated and agreed as follows: Wright Flood shall have until **Friday, August 28, 2020**, to file its response brief to ImageKeeper's motion for preliminary injunction filed on August 6, 2020 (ECF No. 2); ImageKeeper shall have until **Friday, September 11, 2020**, to file its reply to Wright Flood's response brief; the Court's hearing on ImageKeeper's motion for preliminary injunction (ECF No. 2), may occur on **Wednesday, September 16, 2020**, or as soon thereafter as available and convenient to the Court; the temporary restraining order granted on August 12, 2020 (ECF No. 15) shall remain in full force and effect up to and including the conclusion of the hearing on ImageKeeper's motion for a preliminary injunction or until that time that the Court otherwise sets for expiration of the same; and the deadline for Wright Flood's answer or responsive pleading to ImageKeeper's complaint (ECF No. 1) shall be due **Wednesday, September 23, 2020**.

GOOD CAUSE APPEARING THEREFOR:

Wright Flood's response brief to ImageKeeper's motion for preliminary injunction (ECF No. 2) shall be filed on **Friday, August 28, 2020**;

ImageKeeper's reply in support of its motion for preliminary injunction (ECF No. 2) shall be

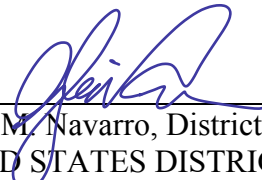
1 filed on **Friday, September 11, 2020**;

2 The Court will hold a hearing on ImageKeeper's motion for preliminary injunction (ECF No.  
3 2) on September 23, 2020, at 10:00 a.m. in Las Vegas Courtroom 7D;

4 The temporary restraining order granted on August 12, 2020 (ECF No. 15) shall remain in full  
5 force and effect up to and including the conclusion of the hearing on ImageKeeper's motion for a  
6 preliminary injunction or until that time that the Court otherwise sets for expiration of the same; and

7 Wright National's answer or responsive pleading to ImageKeeper's complaint (ECF No. 1)  
8 shall be filed on **Wednesday, September 23, 2020**.

9 **IT IS SO ORDERED** this 18 day of August, 2020.

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13 Gloria, M. Navarro, District Judge  
14 UNITED STATES DISTRICT COURT  
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